Thomas R. Gill, Esq.

From: Miles Scully [Mscully@gordonrees.com]
Sent: Tuesday, May 13, 2008 7:33 AM
To: trgill@gillgroupapc.com
Subject: Re: Deposition of Dr. Davidson

Follow Up Flag: Follow up
Flag Status: Purple

I am taking this deposition to determine my response to your request on plaintiff's deposition. No stipulation is needed. I can take the deposition of Dr. Davidson anytime I want. Please provide dates. Thanks.

----- Original Message -----
From: Thomas R. Gill, Esq. <trgill@gillgroupapc.com>
To: Miles Scully
Sent: Mon May 12 22:18:11 2008
Subject: Deposition of Dr. Davidson

Miles:

Please put together a proposed stipulation for signature. For example, you make no mention of Dr. Davidson's presence at the deposition. I don't mind your having distinct purposes, but unless my original concern is addressed we cannot proceed, at least not informally. Tom Gill needs her present as a medical consultant. Again, I cannot assess how he's doing and neither can Mr. Hagen assess his own ability to continue. Finally, for purposes of her deposition, and closely related (such as scheduling), I would be representing Dr. Davidson. Dr. Davidson will not be Plaintiff's expert.

Tom

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EXHIBIT A